

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LESTER LEE
Plaintiff, Pro Se

v.

Case No. 8:24-cv-01205-ABA

BROOKSIDE PARK CONDOMINIUM, INC.,
METROPOLIS (MCM, INC.),
RAMMY AZOULAY,
LAMONT SAVOY
Defendants.

**EMERGENCY NOTICE TO DEFER ENTRY OF JUDGMENT AND NOTICE OF
FORTHCOMING EXHIBITS**

Plaintiff Lester Lee, proceeding pro se, respectfully submits this Emergency Notice to defer entry of judgment and notify the Court that supplemental exhibits referenced in prior filings are being finalized and will be submitted no later than 4:00 PM today, July 11, 2025.

Plaintiff further clarifies that the Sur-Reply in further support of the Motion to Disqualify Counsel was submitted via the EDSS system at approximately 8:00 AM on July 10, 2025, but did not appear on the docket until 10:15 AM—during the hearing itself. As such, Plaintiff believes the Court may not have had an opportunity to review that filing prior to evaluating or ruling on the pending motions.

The forthcoming exhibits include key MPIA requests that remain pending but are expected to yield evidence showing improper conduct and agency coordination. They also include documentation clarifying that Plaintiff did not authorize former counsel Richard Rosenthal to release discovery, and that said discovery was filed by an individual not licensed in this District, whom Plaintiff identifies as Mr. Rosenthal's assistant. Defense counsel previously objected to this individual's filings on those same procedural grounds.

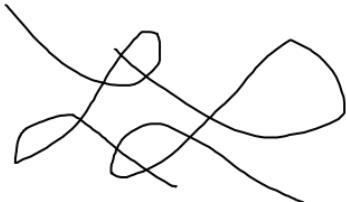
The forthcoming exhibits are not merely supplemental; they are expected to contain critical, potentially dispositive evidence obtained through official MPIA requests directed to Prince George's County Animal Control and the Department of Permitting, Inspections, and Enforcement (DPIE). These records are anticipated to expose direct contradictions in the Defendants' sworn statements, reveal improper coordination with third-party agencies, and confirm that adverse actions taken against the Plaintiff were not only discriminatory but retaliatory in nature. This pending documentation goes to the very heart of the summary judgment issues now before the Court. Premature entry of judgment without review of this imminent, high-probative-value evidence would irreparably prejudice Plaintiff's case and risk a manifest miscarriage of justice.

Due to these unresolved issues and outstanding evidence, Plaintiff respectfully requests that the Court defer or stay entry of judgment until

1 the supplemental exhibits can be reviewed and the forthcoming motion to reopen judgment under Rule 56(d) or 60(b) can be filed in full.

This filing is made in good faith and with urgency to prevent procedural prejudice and to preserve Plaintiff's rights under the Fair Housing Act and ADA.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lester Lee".

Lester Lee
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Date: July 11, 2025